UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF TEXAS

NATALIE VEREIN, an individual,	Case No.
Plaintiff,	<u> </u>
v.	United States Courts Southern District of Texas FILED
RUBEN SUKIASYAN an individual,	APR 1 6 2025
Defendant.	Nathan Ochsner, Clerk of Court

COMPLAINT FOR COPYRIGHT INFRINGEMENT

Plaintiff Natalie Verein ("Plaintiff"), appearing pro se, respectfully submits this Complaint and Emergency Application for a Temporary Restraining Order ("TRO") and Preliminary Injunction against Defendant Ruben Sukiasyan ("Defendant"), and alleges as follows:

NATURE OF THE ACTION

- 1. This is an action for copyright infringement under the Copyright Act of 1976, 17 U.S.C. § 101 et seq., arising from Defendant's willful and unauthorized reproduction, marketing, and sale of Plaintiff's federally registered tarot card work.
- 2. Plaintiff seeks urgent injunctive relief, including a TRO, to prevent further irreparable harm resulting from

Defendant's continued infringement on Amazon.com and to restrict access to proceeds derived from the sale of infringing goods.

JURISDICTION AND VENUE

JURISDICTION AND VENUE

- 3. This Court has jurisdiction pursuant to 28 U.S.C. §§ 1331 and 1338(a).
- 4. Venue is proper under 28 U.S.C. § 1391(b), as a substantial portion of the infringing acts occurred in this District.
- 5. Defendant has consented to this Court's jurisdiction by submitting a DMCA counternotification to Amazon, thereby agreeing to jurisdiction in any federal district in which Amazon is located.

THE PARTIES

- 6. Plaintiff Nataliia Vereina is an individual residing in Kingwood, Texas, doing business as Witchy Cauldron.
- 7. Plaintiff is the sole and exclusive owner of the copyrighted work titled "Learning Tarot Cards. Spanish edition," registered with the United States Copyright Office under Registration Number TXu 2-367-000 on March 5, 2023. A true and correct copy of the registration certificate is attached hereto as Exhibit A.
- 8. Upon information and belief, Defendant Ruben Sukiasyan is an individual residing at 12320 Burbank Blvd #110, Valley Village, California 91607, and operates a seller account on Amazon.com.

FACTUAL BACKGROUND

- 9. Plaintiff is the creator of a widely distributed and well-known tarot learning deck, which has been marketed and sold under the Witchy Cauldron brand, enjoying considerable commercial success.
- 10. The copyrighted work includes original translated text, educational layout, and design features created by Plaintiff in 2022.

- 11. Defendant, without authorization, has reproduced and marketed a substantially identical product on Amazon under ASIN B0DY6R3JC7, using Plaintiff's protected content.
- 12. On or about March 2025, Plaintiff submitted a valid Digital Millennium Copyright Act (DMCA) notice to Amazon, identifying unauthorized use of her copyrighted work in a product listing under ASIN B0DY6R3JC7, attributed to Defendant. Amazon reviewed the complaint, assigned it Complaint ID 17517413911, and subsequently removed the infringing listing from the Amazon marketplace. A true and correct copy of Amazon's acknowledgment of the DMCA takedown and related correspondence is attached hereto as Exhibit F.
- 13. Defendant submitted a counter-notification containing materially false statements, claiming the content originated from a manufacturer on Alibaba. The listing and its promotional materials closely replicate Plaintiff's original work. The counter-notice is attached as Exhibit C.
- 14. On April 7, 2025, at 6:05 PM CST, Plaintiff issued a Final Notice of Copyright Infringement via both certified mail and email, affording Defendant seven (7) calendar days to voluntarily remove the infringing content. A copy of this notice is attached as Exhibit D.
- 15. As of the date of this filing, Defendant has not removed the content nor responded. Amazon is poised to reinstate the listing absent judicial intervention by April 17, 2025.
- 16. Defendant's conduct is willful, malicious, and undertaken with full knowledge of Plaintiff's exclusive rights. It is calculated to exploit Plaintiff's goodwill and intellectual property for commercial gain.

CLAIM FOR RELIEF

(Copyright Infringement – 17 U.S.C. § 501)

- 17. Plaintiff incorporates by reference all preceding paragraphs as if fully set forth herein.
- 18. Plaintiff is the exclusive owner of a valid copyright in the work titled *Learning Tarot Cards. Spanish edition*, registered under Registration No. TXu 2-367-000.
- 19. Defendant has violated Plaintiff's exclusive rights under 17 U.S.C. §§ 106 and 501 by reproducing, selling, and distributing copies of Plaintiff's copyrighted work without authorization.
- 20. Defendant's infringement has caused and will continue to cause Plaintiff irreparable harm, including reputational damage, consumer confusion, loss of revenue, and dilution of brand value. Such harm cannot be fully compensated through monetary damages alone.
- 21. Plaintiff is entitled to injunctive relief to prevent further infringement, statutory damages of up to \$150,000 per infringement, and recovery of actual damages and profits, as well as attorneys' fees and costs, pursuant to 17 U.S.C. §§ 502, 504, and 505.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court enter judgment in her favor and grant the following relief:

A. A permanent injunction enjoining Defendant from reproducing, distributing, displaying,

substantially similar works;

- B. An order directing the destruction or forfeiture of all infringing materials in Defendant's possession, custody, or control:
- C. An award of statutory damages under 17 U.S.C. § 504(c), or in the alternative, Plaintiff's actual damages and Defendant's profits attributable to the infringement;
- D. An award of Plaintiff's costs and reasonable attorneys' fees pursuant to 17 U.S.C. § 505:
- E. Such other and further relief as the Court deems just and proper.

Dated: April 16, 2025 Respectfully submitted,

Natalie Verein, pro se

4311 Long Glen Drive Kingwood, TX, 77339 +18322081053 legal@withycouldron.com

EXHIBIT LIST

Exhibit A - Certificate of Copyright Registration

A true and correct copy of U.S. Copyright Registration No. TXu 2-367-000 for Learning Tarot Cards. Spanish edition, issued on March 5, 2023, in the name of Nataliia Vereina.

Exhibit B - Side-by-Side Comparison of Plaintiff's Work and Pirated Product Comparative visual evidence showing Plaintiff's original copyrighted tarot cards alongside the infringing

product sold under ASIN B0DY6R3JC7. Highlights include identical text, layout, and format.

Exhibit C - Defendant's DMCA Counter-Notification Submitted to Amazon Full copy of the counter-notice submitted by Defendant Ruben Sukiasyan under Complaint ID 17517413911, falsely claiming ownership and denying copyright infringement.

Exhibit D - Final Notice of Copyright Infringement to Defendant Copy of Plaintiff's written Final Notice sent on April 7, 2025, via certified mail and email, demanding removal of infringing content within 7 days.

Exhibit E - Certified Mail Receipt and Delivery Confirmation

Proof of certified mailing and delivery of Exhibit D to Defendant's listed address.

Exhibit F - Amazon Complaint Details for DMCA Takedown

Email correspondence from Amazon confirming receipt of Plaintiff's original takedown notice and the counter-notice, including Amazon's notice that the listing will be reinstated unless Plaintiff files suit within 10 business days.

Exhibit A Certificate of Copyright Registration

Certificate of Registration



This Cartificate issued in the time tend of the timpyright Office in accordance with telle ps, timbed State, Code, afterts that egotpoint has been in ide for the work adoptified below. The information on this certifications been made a pert of the Copyright Office records.

Spira Personatter

Registration Number TXu 2-367-000

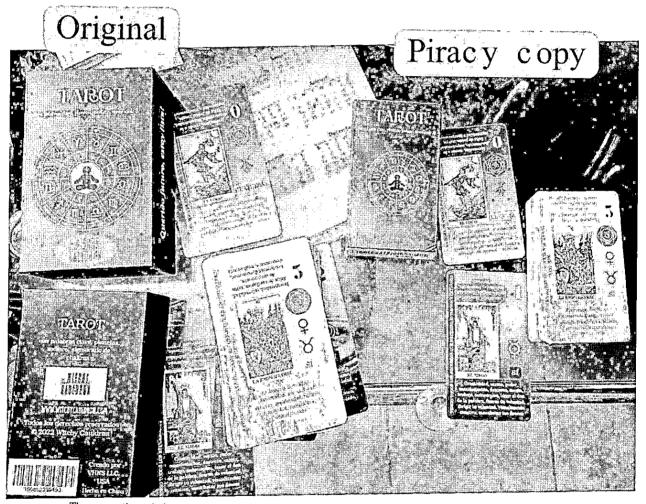
Effective Date of Registration: March 05, 2023 Registration Decision Date: April 28, 2023

Title	
Title of Work:	Learning Farot Cords. Spanish edition
Completion/Publication	
Year of Completion:	
Author	
• Author: Pseudonym: Author Created: Work made for hire: Citizen of: Domiciled in: Year Born: Pseudonymous:	Natalie Verein Annabel Wieca Translation No United States Umted States 1990 Yes
Copyright Claimant	
Copyright Claimant:	Natalie Verein 4311 Long Glen Dr. KINGWOOD, TX. 77339
Limitation of copyright cla	
Material excluded from this claim: Previous registration and year:	photograph(s), artwork TNU2304549, 2022
New material included in claim:	text, Translation
Rights and Permissions _	
Name: Email: Telephone:	Nutalie Verein natalysereina@gmail.com (832)208-1053

Exhibit B Side-by-Side Comparison of Plaintiff's Work and Pirated Product

The image on the right is an unauthorized copy of my copyrighted work shown on the left: "Learning Tarot Cards - Spanish Edition."

Copyright Reg. No.: TXu 2-367-000 Date: April 28, 2023 Jurisdiction: United States



These creative choices are original to our Learning Tarot Cards - Spanish Edition and are protected under U.S. copyright law.

The unauthorized version uses the same visual presentation, icon placements, and Spanish translations, which are the result of our own research, design, and expression - not generic elements. This reproduction violates our exclusive rights under Copyright Registration No. TXu 2-367-000, effective April 28, 2023.

Exhibit C Defendant's DMCA Counter-Notification Submitted to Amazon

Ŋ ď) Ç Ö 效 Thu, Apr 2, 10:38 AM (12 days ago) no-replies-appeal@amazon.com ്മ് 🗘 നാ-നാലാല ഷാബായത്തെയാന വാഷ 201103)

We bare received a counter-notice, from an Amazon seler, to your report(s) of posting, hosting and/or distributing universed copyright protected material on our network. Below are the defails of the complaint and ASIN targeted in the complaint.

Complaint ID; 17517413911

The: Sparish Tarol Cards, Beginner Frienchy Deck with Astrology Symbols, Bustbaled Guide Cards Tarot españiol para principantes, Tarol con significado en Ellos en las tarjetas

The counter notice submitted is provided below for your records. We will allow this material to become accessable, unless you provide us with notice that a laward has been filed against the counter-noticing party willin 10 business days. Please ensure a copy of the lawsed is sent to increase and the control of the persons of to deer processing. Note, that if a copy of the lawsuit is not provided within 10 business days, the identified context above will be reinstated.

Nama: Rubon Emai Address, <u>sunice I Shistmal com</u> Maling Address: 12220 Burbank Bivd # 110 Phone Number: 8162007865 🏑 (I) I am located in the United States and I consent to the jurisdiction of the Federal District Court for the judicial district newbork (CKTKC) or an agent of such person. V (iii) I have a good faith belief that the malerial identified in the Noice of Intringement was removed or disabled as a result of mistake or misidentification of the material to be removed or disabled. V (iV) I declare under penally of perjuny under the larvs of the United States of America that this Counter-Notification and all statements therein ere true and correct. V (V) I ACKNOWLEDGE THAI PROVIDING FALSE STATEMENTS IN A COUNTER-NOTICE MAY LEAD TO CIVIL. my actiess is located (CR) I am located outside of the United States and I consent to the jurisduction of any judicial district in which Amazon may be found. 🗸 (II) I agree to accept sentice of process from the person who provided notification under subsection ASIN: BUDYGR3JOT Complant ID, 17517413911 You recently provided me with a copy of a Notice of Instingement under the Digital Malennium Copyright Act (CAACA). This father is a Counter-Notification as authorized in § 5.12(g) of the DAICA. I have a good icit) belief that the material identified in the Notice of Indiagement was removed or disabled as a result of mistake or misidentification of the material is be removed or disabled. Therefore request that the meterial be replaced and/or no longer disabled. FENALTIES OR CRIBANAL PROSECUTION Enter your full name as a means of a digital signature. Please note that by entering your full name you are providing us with your digital signature which is legally binding. Ruten Subiasyan ritaterial in question formerly appeared on Amazon vebsite with Amazon Standard (dentification Number (ASIN); I have bought these cards to reself from Abbaba.com from a reputable supplier that prints them.

Thank You, Amazon f Reply (+ Forward)



Exhibit D Final Notice of Copyright Infringement to Defendant

Legal Notice of Copyright Infringement - Unauthorized Use of Copyrighted Work



To suklas 17@hotmall.com on 2025-04-07 18:05

☑ Detoils Headers Flain text

Dear Mr. Sukiasyan/Naira Grigoryan ,

This letter serves as formal legal notice on behalf of VHNS LLC, doing business as Witchy Cauldron, the sole and exclusive copyright holder of the creative work titled "Learning Tarot Cards - Spanish Edition", registered with the U.S. Copyright Office under the following registration:

- Copyright Registration Number: TXu 2-367-000
- Effective Date of Registration: April 28, 2023
- Jurisdiction: United States

We have received a copy of your DMCA counter-notification filed with Amazon in response to our original takedown request for ASIN BODY6R3JC7, in which you claim a "good faith belief" that the content was removed due to mistake or misidentification. This claim is categorically false.

The product in question contains unauthorized reproductions of our copyrighted work, including original card text, structural layout, design elements, and symbolism—all protected under U.S. copyright law. Your admission that the cards were purchased from a third-party supplier on Alibaba does not absolve you of liability. U.S. Copyright Law clearly holds distributors and resellers accountable, regardless of supplier source.

Final Warning - Legal Action Imminent

Because of your submission of a false counter-notice under the DMCA, we have to let you know that we have put us into a position where legal action is our only option to protect our rights. As per 17 U.S.C. § 512(g), we are prepared to file a lawsuit in federal court to prevent the reinstatement of the infringing listing.

If we don't get a written response and resolution within 7 calendar days of this notice, we will proceed with filling a lawsuit without further communication.

We will also seek:

- Injunctive relief to immediately and permanently remove the infringing product
- Statutory damages under 17 U.S.C. § 504 (up to \$150,000 for willful infringement)
- Compensation for financial harm and reputational damage
- · Recovery of attorney's fees and court costs

You may still avoid litigation by immediately:

- 1. Ceasing all sales and distribution of the infringing product
- 2. Withdrawing your counter-notice from Amazon
- 3. Providing a written statement confirming compliance and intent not to repeat the infringement

This notice is issued without prejudice to any additional claims or remedies available to our client, all of which are expressly reserved.

Sincerely,
Natalle Verein
Legal Representative for VHNS LLC
legal@witchycauldron.com

Exhibit E Certified Mail Receipt and Delivery Confirmation

Mailform

Mailform, Inc. 607 North Avenue, Door 18 Wakefield, MA 01880 Phone: +18053959596 Email: team@mailform.io

Nataliia Vereina
4311 Long Glen dr
Kingwood, TX 77339
United States
Email: natalyvereina@gmail.com

Invoice Number: 392a8981-3434-4550-99e2-1ae3742b9634

Date: April 7, 2025

Description	Quantity	Price	Amount
#6ae8cd32-e62f-45a8-b651-7ad9c0bed764 Recipient: Ruben, 12320 Burbank Blvd # 110, Valley Village CA 91607, United States Services: CERTIFIED,PHYSICAL RETURN RECEIPT Files: 17517413911.pdf USPS Certified Mail w/Physical Return Receipt; 2 pages; Double Sided; Black & White	1	17.77	17.77

Total: 17.77 Amount Paid: 17.77

Page 1 of 1

Tracking Information

92147901324734002185022914

Remove :

Tracking Number:

92147901324734002185022914

Copy Add to Informed Delivery

Latest Update

Your item was delivered to an individual at the address at 1:21 pm on April 15, 2025 in VALLEY VILLAGE, CA 91607.

April 15, 2025 in VALLEY VILLAGE, CA 91607.

See All Tracking History

What Do USPS Tracking:

, n

Get More Out of USPS Tracking:

Exhibit F Amazon Complaint Details for DMCA Takedown

Home > Mondor: Submission history > Complaint ID: 17517413911

Complaint details

Status: @Acrosted

Date submitted: Mar 31, 2023, 09:22 PM

Amazon storet 🍮 amazon.com

Infringement type: Copyright: Product or puckaging

Brand: Witchy Cauthon

Website link: https://www.arnham.com/dp/80859LCQnM

Contact name: Matalia Victory

Contact email: petalysembra@gmail.com Submitter email: nately vereing@gmail.com

Submission type: Report a Violation

Additional information

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feegls ration information and pulsolicities of applicable intellectual property right. Registration Number TVL 2-357-300. Ell-ective Date of Registration, April 29, 2025. Application Charles States.

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BOIMGRESIC7	Spanish Taron, Card's, Beginner Friendly Deck with Astrology Symbols, Illustrated Guide Cards Tarot español para principlantes, Taron con significado en Ellos en las tarjetas	Committee ACIN:	May 31, 2025, 09:22 PM	Status *\ Ø Accepted	•
Seller con	tact details	Management of the Control of the Con		10 results per pag	pe .

	Response to Counter-Notice - Complaint ID: 17517413911 / ASIN: BODY6R3JC7 - WELLISSON		_
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	Oest Amazon IP Team,		
	We are writing in response to the counter-nectication submitted under Complaint ID: 47517413911 regarding ASIN 800YER3UC7. Please be somed that we have issued a Final Rotice of Copyright infringement to the party in question (Ruber Subseys) was both certified mad and email, using the eddress and contact details they provided in that counter-notice. In accordance with 17 U.S.C. § 512(gXCX)C), we are recovering an additional 7 days to allow time for a response from the recipient and to finalize exit legal filtre. We are tuly proposed to submit a copy of the cardition mail receipt and email delivery. If we do not receive a response from the intringing party by April 16th, 2023, we will proceed with filtry a copyright Infringement Lowsuit in tederal court. A copy of the lowsuit will be quickly provided to your fearn when they file it, as required by A	y cont wril 2:	Serm 3
	Sincerely, Natalia Vereina VRDS-TLC Ratalyser ethna@grant com *1 (822) 200-1053		
	ip-info-request@amazon.com (§) O Clore = Fig. April 15526467 doss 2023 * Grave = Fig. April 15526467 doss 2023 * Fig. April 15526467 doss 2023 * Fig. April 1552647 doss 2023 *	•	
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;	Thank you for your massage. Amount complete with the Digital falloratum Copyright Act (DMCA). Under too DMCA, once Amazon has received a valid place Amazon, time or general that DMCA notice, a counter-noticing party must make a student populary of portion that they control that was removed it not inhinging. Once a counter-notice is received by Amazon, time original character has 10 business days to fice a largest and activities and counter-notices reparting DMCA notices. In original character has 10 business days to fice a largest applicable from the U.S. Potent and Trademark Officer inhibitations and counter-notices, please remove this document available from the U.S. Potent and Trademark Officer inhibitations and the second counter-notices. Proceedings to the process may not noticely a response. Thank you for understanding our position on this mutter. Regards,	statem ve cou	i Pir I
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JS 44 (Rev. 03/24)

CIVIL COVER SHEET

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS		DEFENDANTS	S'	_
Natalie Verein		RUBEN SUKIA	ASYAN	
(b) County of Residence		County of Residence	e of First Listed Defendant	
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<u></u>	_	III. CITIZENSHIP OF P	RINCIPAL PARTIES	(Place an "X" in One Box for Plaintiff and One Box for Defendant)
1 U.S. Government Plaintiff	See See		TF DEF	PTF DEF
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2 U.S. Government Defendant	4 Diversity (Indicate Citizenship of Parties in Item III)	Citizen of Another State	2 2 Incorporated and	Principal Place 5 5
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IV. NATURE OF SUI	(Place an "X" in One Box Only)		Click here for: Nature of	Suit Code Descriptions.
110 Insurance	PERSONAL INJURY PERSONAL INJU		BANKRUPTCY	OTHER STATUTES
120 Marine 130 Miller Act	310 Airplane 365 Personal Injury 315 Airplane Product Product Liability	of Property 21 USC 881	422 Appeal 28 USC 158 423 Withdrawal	375 False Claims Act 376 Qui Tam (31 USC
140 Negotiable Instrument	Liability 367 Health Care/	y	28 USC 157	3729(a)) 400 State Reapportionment
150 Recovery of Overpayment & Enforcement of Judgmen			PROPERTY RIGHTS 820 Copyrights	410 Antitrust 430 Banks and Banking
151 Medicare Act 152 Recovery of Defaulted	330 Federal Employers' Product Liability Liability 368 Asbestos Persons		830 Patent	450 Commerce
Student Loans (Excludes Veterans)	340 Marine Injury Product 345 Marine Product Liability		835 Patent - Abbreviated New Drug Application	460 Deportation 470 Racketeer Influenced and
153 Recovery of Overpayment of Veteran's Benefits	Liability PERSONAL PROPE		840 Trademark 880 Defend Trade Secrets	Corrupt Organizations 480 Consumer Credit
160 Stockholders' Suits	350 Motor Vehicle 370 Other Fraud 371 Truth in Lending	710 Fair Labor Standards	Act of 2016	(15 USC 1681 or 1692) 485 Telephone Consumer
190 Other Contract 195 Contract Product Liability	Product Liability 380 Other Personal	720 Labor/Management	SOCIAL SECURITY	
196 Franchise	Injury 385 Property Damage	740 Railway Labor Act	861 HIA (1395ff) 862 Black Lung (923)	490 Cable/Sat TV 850 Securities/Commodities/
	362 Personal Injury - Product Liability Medical Malpractice	751 Family and Medical Leave Act	863 DIWC/DIWW (405(g)) 864 SSID Title XVI	Exchange 890 Other Statutory Actions
REAL PROPERTY 210 Land Condemnation	CIVIL RIGHTS PRISONER PETITIO 440 Other Civil Rights Habeas Corpus:	NS 790 Other Labor Litigation 791 Employee Retirement	865 RSI (405(g))	891 Agricultural Acts
220 Foreclosure 230 Rent Lease & Ejectment	441 Voting 463 Alien Detainee	Income Security Act	FEDERAL TAX SUITS	893 Environmental Matters 895 Freedom of Information
240 Torts to Land	442 Employment 510 Motions to Vacat Sentence	e	870 Taxes (U.S. Plaintiff or Defendant)	Act 896 Arbitration
245 Tort Product Liability 290 All Other Real Property	Accommodations 530 General 445 Amer. w/Disabilities - 535 Death Penalty	IMMIGRATION	871 IRS—Third Party	899 Administrative Procedure
	Employment Other: 446 Amer, w/Disabilities - 540 Mandamus & Other	462 Naturalization Application	26 USC 7609	Act/Review or Appeal of Agency Decision
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VII. REQUESTED IN COMPLAINT:	CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.	N DEMAND \$	CHECK YES only i	if demanded in complaint:
VIII. RELATED CASE IF ANY	(See instructions): JUDGE			
DATE		FORNEY OF RECORD	DOCKET NUMBER	
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FOR OFFICE USE ONLY				
RECEIPT#AM	OUNT APPLYING IFP	JUDGE	MAG. JUD	GE